

EXHIBIT I



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August 31, 2022

Via Certified Mail, Return-Receipt Requested

VGW Holdings US, Inc.
c/o The Corporation Trust Company
Corporation Trust Center 1209 Orange St.
Wilmington, DE 19801

VGW Holdings US, Inc.
c/o Escalon Services, Inc.
2345 Yale Street, First Floor
Palo Alto, CA 94036

VGW Luckyland, Inc.
c/o The Corporation Trust Company
Corporation Trust Center, 1209 Orange St.
Wilmington, DE 19801

VGW Luckyland, Inc.
c/o Escalon Services, Inc.
2345 Yale Street, First Floor
Palo Alto, CA 94306

RE: Cease & Desist Demand; Infringement of LUCKY DUCK Trademark

To Whom It May Concern:

This firm represents Epic Tech, LLC (“Epic Tech”). Please accept this correspondence as my client’s formal demand that you cease and desist from the activities identified herein and our notice to you of a potential claim for trademark infringement and unfair competition.

Epic Tech is the owner of the mark LUCKY DUCK bearing the Federal Trademark Registration Number 3853565. Since April 1, 2007, Epic Tech has used LUCKY DUCK on gaming equipment, namely, gaming machines being configured to offer electronic slot games, electronic bingo games, electronic casino games, and electronic sweepstakes games. The USPTO granted a registration to Epic Tech on September 28, 2010, for such use. On November 27, 2015, the USPTO acknowledged the CA\$H BASH mark as incontestable.

Recently, Epic Tech has become aware that VGW Holdings US, Inc. and/or VGW Luckyland, Inc. (collectively, “VGW” or “You”) has been using the title “Lucky Duck” in connection with an online gaming site including play-for-fun and sweepstakes-style slot machine gaming through the website luckylandsslots.com (the “Website”). I have enclosed a screen capture of the game selection screen that makes multiple uses of the words LUCKY DUCK as well as graphics which are quite similar to the graphical portion of Epic Tech’s registered LUCKY DUCK mark.

Your ongoing use of the “Lucky Duck” title in the manner described above constitutes infringement and counterfeiting of Epic Tech’s registered LUCKY DUCK mark. Such use is

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unauthorized and is prohibited by state and federal law, including, but not limited to, Section 43(a) of the Lanham Act and other state laws prohibiting unfair competition.

Epic Tech hereby demands that you immediately cease and desist from any further use of the LUCKY DUCK mark in the United States, including any images which are similar to its registered mark. Epic Tech also demands that you: (1) confirm, in writing, your agreement to immediately stop use of the LUCKY DUCK mark (or any similar mark); (2) begin the takedown of any and all uses of the LUCKY DUCK mark in the United States; and (3) provide full revenue information for VGW Luckyland, Inc. and VGW Holdings US, Inc. relating to Your infringement of the LUCKY DUCK mark for the full time period that such title has been used by You in any context.

Please let me know no later than Monday, September 12, 2022 whether you intend to comply with the above demands.

Do not hesitate to contact me should you have any questions.

Yours Truly,



Kelly O. Wallace
Wellborn, Wallace & Mullman, LLC

